

EXHIBIT B

Diana Breaux

From: Matthew Shayefar <matt@bostonlawgroup.com>
Sent: Thursday, September 5, 2019 12:00 PM
To: Diana Breaux
Cc: Val Gurvits; Frank Scardino; 'phil@mannlawgroup.com'
Subject: TinyBuild v Nival - Discovery

Hi Diana,

We haven't had an opportunity to meet yet, but I'm Matt Shayefar, another lawyer for Nival in the Tinybuild case.

We're going through our responses to the discovery you served last month and would like to ask for a few more weeks to allow us to polish them off and send them to you. Would you agree to provide us an extension until September 27, 2019 to serve you responses?

Somewhat tangentially, we're seeing that some of the responses and documents that we may otherwise have to provide constitute confidential information or are otherwise sensitive, which we would not produce absent a protective order. So I wanted to take this moment ahead of time to see if we can start putting together a protective order to expedite getting those sensitive responses and documents to you. Do you in principle agree to such a protective order? If so, we can put a draft together for your review.

Please let me know your thoughts on the above.

Best,

Matthew Shayefar

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